

EXHIBIT “K”

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

EXECUTIVE CAR WASH OF MAPLE GLEN	:	NO. 02-CV-3747
	:	
v.	:	
	:	
ENVIRONMENTAL INC.	:	
	:	
and	:	
	:	
ENVIRONMENTAL HAZARD SERVICES, INC.	:	
	:	
v.	:	
	:	
ATLANTIC PETROLEUM TECHNOLOGIES, INC. :	:	

**PLAINTIFF'S SUPPLEMENTAL ANSWERS TO INTERROGATORIES
DIRECTED TO PLAINTIFF, EXECUTIVE CAR WASH OF MAPLE GLEN**

GENERAL OBJECTIONS

Plaintiff, Executive Car Wash of Maple Glen, incorporates all previously-stated objections to Defendants' Interrogatories. Without waiver of those objections, Plaintiff supplements its answers to the Interrogatories below:

ANSWERS TO INTERROGATORIES

4. Dr. Robert Marion, Curriculum Vitae previously supplied.

5. Dr. Marion will testify that the underground storage tanks should have been discovered and/or that as part of the Phase I examination, that it should have been noted that additional investigation was required, said investigation which would have uncovered the underground storage tanks.

Dr. Merion examined the Phase I studies, reports of Bell Environmental, as well as the documentation indicated in his previous reports, all of which have been previously produced.

KAPLIN STEWART MELOFF REITER & STEIN, PC

By: 

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Dated: February 12, 2004